

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

Adrian L. Robinson, Sr. and Terri J.
Robinson as Personal Representatives and
Co-Administrators of the Estate of Adrian
Lynn Robinson, Jr., DECEASED, et al.,

No. 2:17-cv-2736-AB

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE, INC.,
et al.

Defendants.

DECLARATION OF DENNIS L. CURRAN

DENNIS L. CURRAN, being duly sworn, deposes and says:

1. I am a Senior Vice President of the National Football League ("NFL") and General Counsel of the National Football League Management Council ("NFLMC"). The NFLMC is the sole and exclusive bargaining representative of the 32 Member Clubs of the NFL. I have been the General Counsel of the NFLMC since 1990. I make this declaration, on personal knowledge, in support of the NFL, the National Football League Foundation, and NFL Properties LLC's Opposition to Plaintiffs' Motion to Remand or in the Alternative to Re-Designate the Case "Unrelated."

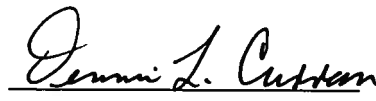
2. Attached as Exhibit 1 is a true and correct copy of the published version of the 2011 CBA between the NFLMC and the National Football League Players' Association ("NFLPA") dated August 4, 2011.

3. Attached as Exhibit 2 is a true and correct copy of the published version of the Constitution and Bylaws of the NFL, Revised as of June 1, 2010. The Constitution and Bylaws of the NFL originally became effective on February 1, 1970 and have been periodically revised over time, including the revision as of June 1, 2010. The June 1, 2010 revised version remained in effect until the Constitution and Bylaws of the NFL were revised once again on September 14, 2016.

4. Attached as Exhibit 3 is a true and correct copy of a Fatal Claim Petition for Compensation by Dependents of Deceased Employees, dated June 16, 2017, submitted to the Pennsylvania Department of Labor & Industry by petitioner Adrian Robinson, Sr.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2017 at New York, New York.


Dennis L. Curran